Benson Family Trust P.O. Box 126 Parowan, UT 84761

February 20, 2020

James Greer, Assistant State Engineer, Technical Division Utah Division of Water Rights 1594 West North Temple suite 220 P.O. Box 146300 Salt Lake City, Utah 84114-6300

Re: Supplemental Comments to proposed Cedar Valley Ground Water Management Plan and policy

Mr. Greer:

The Benson Family Trust submits these comments in response to the meeting held October 15, 2019, which extended the comment period until February 28, 2020, and as a supplement to our comments dated November 11, 2019. In those comments we requested that senior spring rights which depend on groundwater be protected in the plan and policy because of the heavy groundwater pumping authorized over the years by the State Engineer. If the State Engineer does not provide some remedy to protect senior spring rights, the state will have taken our most senior priority. Priority is the most valuable aspect of a water right.

We propose as a solution to simply adopt the same remedy provided spring right owners in other ground water management plans and policies across Utah. For example, page 7 of the State Engineer's 2014 Cedar Valley and Northern Utah Valley Groundwater Management Plan allows spring owners whose flows have decreased due to groundwater development, to drill a well for replacement water, while maintaining the original priority. A similar provision should be included in the Cedar City Valley Ground Water Management Plan and the Policy.

Enson (Trustel)

Thank you for the opportunity to submit these further comments.

Sincerely,

Mary Lisa Benson, Trustee Benson Family Trust

Kerry Benson

cc: Nathan Moses, Regional Engineer

646 North Main Street

P.O. Box 506

Cedar City, Utah 84721-0506

RECEIVED
FEB 2 4 2020
WATER RIGHTS
CEDAR CHAR